

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION**

In re:	§
	§ CASE NO. 21-10464
Pamela Jean Wellons.	§ CHAPTER 13
	§
Debtor	§

Carvana, LLC,	§ CONTESTED MATTER
	§
Respondent	§
v.	§
Pamela Jean Wellons, Debtor	§
Jonathan W. DeLoach, Trustee	§
	§
-----	§

OBJECTION TO CONFIRMATION

COMES NOW, Carvana, LLC, (Carvana) and makes and files its Objection to the Confirmation of the Debtor's Chapter 13 case for the reasons set forth below:

1.

Carvana, holds a first priority lien on the Certificate of Title to the Debtor's 2017 Nissan Altima; VIN 1N4AL3AP5HC476737, a true and accurate photostatic copy of the Title is attached hereto as Exhibit A.

2.

The subject vehicle was purchased on 2/14/2019, which is within 910 days of the filing of the within case and should be paid in full pursuant to 11 U.S.C Section 1325(a)(9).

3.

The Debtor's proposed adequate protection payment and interest rate are insufficient to provide Carvana with adequate protection.

THEREFORE, based upon the above and foregoing facts Carvana objects to the confirmation of the Debtor's Chapter 13 case.

This September 2, 2021

Respectfully Submitted

/s/ Richard B. Maner

Richard B. Maner, GA Bar No. 486588

Attorney for Respondent

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CERTIFICATE OF SERVICE

This is to certify that I have served a copy of **OBJECTION TO CONFIRMATION** electronically. Those not served electronically have been served by depositing same in the United States Mail in a properly addressed envelope to each with adequate postage thereon as follows:

Pamela Jean Wellons
602 E. 3rd Ave.
Cordele, GA 31015

Cawthon H. Custer
Custer, Custer and Clark, LLC
P.O. Box 605
Albany, GA 31702

Jonathan W. DeLoach
Office of The Chapter 13 Trustee
P. O. Box 1907
Columbus, GA 31902

This September 2, 2021

/s/ Richard B. Maner

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Carvana LLC

Lien and Title Information

Lienholder

ELT Lien ID 001101896845
Lienholder CARVANA LLC
Lienholder Address
Lien Release Date

Vehicle and Titling Information

VIN	1N4AL3AP5HC476737	Issuance Date	3/14/2019
Title Number	770094190600962	Received Date	3/14/2019
Title State	GA	ELT/Paper	ELECTRONIC
Year	2017	Odometer Reading	
Make	NISS	Branding	
Model			
Owner 1	PAMELA JEAN WELLONS		
Owner 2			
Owner Address	602 E 3RD AVE CORDELE, GA 310153609		

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